

Superfund/Oil Program Implementation Manual FY 02/03

Chapter II: Program Planning and Reporting Requirements

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Chapter II Program Planning and Reporting Requirements

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CHAPTER II PROGRAM PLANNING AND REPORTING REQUIREMENTS

II.A INTRODUCTION

The Government Performance and Results Act (GPRA) establishes a general framework within which the Agency plans its activities. It focuses the Agency on planning strategically (in consultation with both internal and external customers), developing annual performance plans with annual performance goals, and carrying out regular program evaluations to ensure these goals are met effectively and efficiently.

The Office of Emergency and Remedial Response (OERR), Office of Site Remediation Enforcement (OSRE), the Federal Facilities Enforcement Office (FFEO), the Federal Facilities Restoration and Reuse Office (FFRRO), and the Outreach and Special Project Staff (OSPS) are responsible for overall program planning, including implementing the requirements of GPRA and reporting on Superfund program accomplishments. *The Superfund Comprehensive Accomplishments Plan (SCAP) is the process by which the Assistant Administrator for the Office of Solid Waste and Emergency Response (AA SWER), Assistant Administrator for the Office of Enforcement and Compliance Assistance (AA OECA), and senior Superfund managers monitor progress towards meeting GPRA annual performance goals.* In addition, SCAP will continue to be used as a management tool to project and track activities that contribute to these GPRA goals and support resource allocation. Regions should continue to plan and report accomplishments in WasteLAN as they have done traditionally.

To more clearly reflect the relationship between GPRA and the SCAP process, GPRA annual performance goals and measures and program targets and measures are defined as follows:

- **GPRA Annual Performance Goals (APG) and GPRA Annual Performance Measures (APM)** - The Agency's Annual Plan describes the specific annual performance goals, annual measures of outputs and outcomes, and activities aimed at achieving the performance goals that will be carried out during the year. APGs are the specific activities that the Agency plans to conduct during the fiscal year in an effort towards achieving its long-term strategic goals and objectives. APMs are used by managers to determine how well a program or activity is doing in achieving milestones that have been set for the year. The annual performance goals will inform Congress and Agency stakeholders of the expected level of achievement for the significant activities covered by the GPRA objective. The goals are a subset of the overall planning and budgeting information that has traditionally been tracked by the Superfund program offices.
- **Program Targets and Measures** are activities deemed essential to tracking overall program progress. Program targets are used to identify and track the number of actions that each Region is expected to perform during the year and to evaluate program progress. Program measures are used to show progress made in achieving program priorities. A subset of these program measures will be targeted for work planning purposes.

Successful planning requires the reflection and accurate costing of program priorities in the budget and workload model, and translation of the priorities and resource requirements into specific commitments via the SCAP. Candid evaluation of performance against these commitments is essential to assess the viability of program priorities, resource requirements and overall program effectiveness.

II.B INTEGRATED PLANNING

Integrated planning is the responsibility of HQ and Regional program offices; Regional finance offices; the States; Tribes; affected communities; the Office of Regional Counsel (ORC); DOJ; and other Federal agencies. Information on planned activities should also be coordinated with the Natural Resources Trustees and the Agency for Toxic

Substances and Disease Registry (ATSDR). To provide adequate resources to achieve Superfund's GPRA objectives and sub-objectives, HQ allocates resources within and between the site assessment, response, enforcement, Federal facilities and Brownfields programs. Regions are responsible for providing data on the level of resources needed to accomplish those priority activities and negotiate commitments consistent with realistic site planning. Regions should not accept targets that require completion of activities that cannot be funded or staffed within the resources provided. This requires Regions to reconcile FY 02/03 targets and their Superfund pipeline with the financial operating plan proposed by HQ.

Flexibility is greatest in the budget planning years. Realistic out year planning data (milestones and funding needs) allows HQ to prepare requests for resources based on Regional needs. Exhibit II.1 summarizes levels of flexibility as the operating year is entered. Major phases in the decision making continuum include:

- *Formulation of the out year GPRA annual performance plan and budget occurs 12 to 18 months prior to the FY.* The GPRA annual performance plan includes objective, results-oriented, quantifiable and measurable performance goals; resources necessary to meet goals; performance indicators to assess outputs, services, and outcomes; and verification and validation procedures. Development of the budget includes identification of major program issues, analysis of program costs, and alignment of resources among competing priorities. The budget will be based upon (1) the President's budget, (2) Regional WasteLAN planning data, and (3) GPRA annual performance goals and the ability of a Region to contribute to the program's targets. Activities receive resource allocations that are established by the Administrator and the Assistant Administrator for the Office of Solid Waste and Emergency Response (AA SWER) or the Assistant Administrator for the Office of Enforcement and Compliance Assurance (AA OECA). These allocations balance the needs of the Superfund program with the needs of other Agency programs.
- *Development of the initial operating plan occurs six months prior to the FY and is finalized before the start of the FY.* The proposed response, Federal facilities, and enforcement operating plans are developed based on the average amount of money obligated/tasked by the Region in each of the AOA categories during the current year, and Regional projections for the upcoming years considering prior year expenditures. OSWER and OECA negotiate the final operating plan based on Region response to the initial operating plan, the Regional pipeline, past Regional accomplishments and planned durations/dollars, Regional requests for the budget reserve, and associated GPRA annual performance goal commitments. OSWER and OECA provide resources to support the program through the Advice of Allowance (AOA) and workload process. Regions are expected to work within the annual Regional budgets established at the start of the year until the mid-year evaluation. Regions have flexibility within the general budget and AOA structure to shift funds as needed to meet priority activities. (See Chapter III for additional information on shifting funds.) Once the operating plan is established at the start of the year, additional resources generally can be shifted to a Region only at the expense of resources from other Regions. However, HQ may shift funds among the Regions depending on the level of use and need.
- *Use of the mid-year evaluation to realign resources in the current FY.* Current year resource adjustments focus on changes needed due to cost and project schedule modifications. Changes may result in shifts within program areas and among Regions, and revised annual funding levels. Estimates developed in April/May for the upcoming FY represent the first formal opportunity for changing resources among program areas at a national level. The revised resource estimates also serve as a "baseline" for examining program needs in the budget year.

Exhibit II.2 describes the information flow and HQ and Regional responsibilities associated with integrated planning.

II.C INTRODUCTION TO THE SUPERFUND COMPREHENSIVE ACCOMPLISHMENT PLAN (SCAP)

The SCAP process is used by the Superfund program to plan, budget, track, and evaluate progress toward achieving Superfund GPRA objectives and sub-objectives. The SCAP planning process is a dynamic, ongoing effort that has a significant impact on Superfund resource allocation and program evaluation. Planned obligations and reporting of GPRA annual performance goals and measures are generated through SCAP and influence the Superfund budget and evaluation process. Such planning is a day-to-day responsibility of the Regions. An annual process has been established through which HQ and Regions formally develop work plans for the future. WasteLAN serves as the conduit for the SCAP process by providing both HQ and Regions with direct access to the same data. Through WasteLAN, reports can be produced allowing for daily interactive updates of planning and site cleanup progress information.

II.D RELATIONSHIP OF SCAP TO OTHER MANAGEMENT TOOLS

The SCAP process is crucial to Superfund program planning, tracking, and evaluation. As the Superfund program's central planning mechanism, it is interrelated with all Agency and Superfund program specific planning and management systems, including the GPRA annual performance plan, the Superfund budget, Agency Operating Plan, Memorandum of Agreement/Management Agreements and the Superfund workload models. GPRA annual performance goals are designed to reflect the strategic plans and the Agency's goals, objectives, and sub-objectives for the upcoming year. As such, SCAP serves as the Superfund Program's Memorandum of Agreement. In some cases, new categories are developed, or the projections for activities are adjusted, to match these goals.

II.D.1 Management Tools

Most of the Superfund program's budget is based on planning and accomplishment data recorded in WasteLAN. The operating year's budget is developed 18 months prior to its beginning. For example, data existing in the third quarter of FY 02 will be used to formulate the FY 04 budget. The site schedules reflected in WasteLAN serve as the foundation for determining out year budget priorities, such as the dollar levels to be requested in the budget and the total level of FTEs to be made available for distribution. Because dollars for Fund-financed remedial actions (RAs), and remedial designs (RDs) dominate the overall Superfund budget, it is critical that the Regions identify RD and RA candidates and projected funding needs. Cost estimates for RAs should be derived using the draft feasibility study or record of decision estimates.

Brownfields budgets are based on decisions during selection of pilot sites. Progress tracking of the Brownfields program is being led by the Institute for Responsible Management (IRM) with support from individual Regions.

The negotiated SCAP targets and resulting budget are reflected in the Operating Plan issued to the Regions early in the fiscal year. This plan requires Congressional approval before it is finalized. Guidance for reprogramming funds between Program Resource Codes (PRC) is provided in the Agency's operating plan.

In FY 02/03, each Region's FTE distribution continues to be frozen at the FY 90 distribution ratio. While the freeze ensures that the total Regional Superfund resources are not affected, shifting of resources within the Region among the different program areas to support Agency/Regional program priorities may occur. All shifts will be based on the national budget (see Chapter III) and program priorities (see Chapter I). Guidance for reprogramming between Program Results Codes (PRCs) are provided in the Agency's operating plan. **[Note: *Shifts between PRCs in excess of \$500,000 requires Congressional approval.*]**

Executive Order 12088, Federal Compliance with Pollution Control Standards, directs the head of each executive agency to ensure that all necessary actions are taken for the prevention, control, and abatement of environmental pollution

with respect to all facilities and activities under control of the agency. The Executive Order directs that an annual plan be developed and submitted to the EPA Administrator and specifies that in preparing its plan, each executive agency will ensure that the plan provides for compliance with all applicable pollution control standards. The Federal Agency Environmental Management Program Planning Guidance (FEDPLAN) is a major compliance assistance tool that implements the Executive Order, and is used to identify, track, and report environmental projects that will enable an agency to meet existing requirements or correct identified compliance problems. OMB Circular A-11 further requires that estimates for design and construction of Federal facilities or remedial environmental projects be submitted (for funding) only after consultation with EPA. EPA will then review each agency's pollution abatement plan during a formal update cycle, using newly designed computer software called FEDPLAN-PC, that provides direct feedback to each Federal agency.

EXHIBIT II.1
FLEXIBILITY SCALE FOR BUDGETING/PLANNING

← Minimum Maximum →		
Operating Year Budget (FY 02)	Planning Year Budget (FY 03)	Out Year Budget (FY 04)
	2. Development of Operating Plan begins 6 Months Prior to FY and is based on prior years obligations and Regional projections for the upcoming years (Begins 02/2)	3. Formulations Begins 12-18 months prior to FY; largely dependent on Regional planning data in WasteLAN (Begins 02/3)
	2. Regional GPRA annual performance goals finalized in September	3. National targets are set based on schedules and estimated costs for program activities, which drive budget request
	2. Pricing factors can be changed through Regional/HQ consensus	3. Pricing factors are subject to review
	2. The budget is set but there is more leeway to make adjustments based on proven need	3. Budget is constrained based on resources cap imposed by AA and Administrator unless exception can be justified
	2. Regions request funds to meet GPRA annual performance and Regional pipeline goals	3. Maximum flexibility to design budget to optimize cross-program priorities
	2. Final GPRA annual performance goals set final resource levels (02/4)	3. N/A
	2. Candidate sites are identified for the Priority Panel	3. N/A

EXHIBIT II.2
HQ/REGIONAL INTEGRATED PLANNING RESPONSIBILITIES

Regional Responsibilities	HQ Responsibilities
<p>Manage projects to integrate Enforcement and Fund milestones and to ensure schedules and time lines are met</p> <p>Involve the State, ORC, and finance offices in the planning process</p> <p>Provide accurate, complete, and timely project planning data in WasteLAN</p> <p>Follow established planning procedures and requirements so that HQ has a common basis with which to evaluate Regional proposals (See Chapter III and the Appendices)</p> <p>Assess Federal agencies environmental projects identified as part of the Office of Management and Budget (OMB) Circular A-11 process and the Federal Agency Environmental Management Program Planning Guidance (FEDPLAN)</p> <p>Identify multi-media planning and cleanup opportunities</p> <p>Achieve program commitments</p> <p>Improve program efficiency by identifying potential unused funds and return them to HQ within reasonable timeframe for redistribution</p>	<p>Establish a combined Fund, Enforcement, Federal facilities, and Brownfields hierarchy of program priorities in consultation with the Regions to be used in work planning and adjustment of targets</p> <p>Review integrated operating plans and site commitments proposed by the Regions prior to work planning</p> <p>Coordinate OSWER, OECA, DOJ, Financial Management Division (FMD), and the Office of Administration and Resources Management (OARM) activities throughout the planning process</p> <p>Work with Regional managers to formulate preliminary resource requests and determine how resources should be adjusted to meet program priorities</p> <p>Communicate with the Regions on changes/additions to schedules</p> <p>Provide funding consistent with each Region's active pipeline phases, shifting Regional resources if needed to support priority activities</p> <p>Develop policy and guidance in response to Congressional or Agency initiatives</p>

II.D.2 Superfund Information Systems

Effective management of the Superfund program requires the availability of accurate information on Superfund sites throughout the country. CERCLIS was developed in the mid-1980s as an integrated system to hold national site assessment, remedial, removal, enforcement, and financial information. In FY 97, all Regions began using the third generation of CERCLIS, now called WasteLAN, to record Superfund planning and accomplishment information. (See Appendix E for more information on WasteLAN)

II.E OVERVIEW OF THE PLANNING PROCESS (SCAP)

The SCAP process generates data that fulfill the following functions:

- Tracking of accomplishments against GPRA annual performance goals and measures;

- Updating planning assumptions (schedules and funds) for the current FY;
- Developing planning data for the upcoming FY; and
- Providing data for out year budget planning purposes.

The SCAP planning process follows a semi-annual work planning schedule. The cycle begins in late March/April with a review of program progress and ends with a formal work planning session in October/November. Therefore, it is essential that planning and accomplishment data in WasteLAN remain current and up-to-date throughout the year and accomplishments be reported as soon as they occur. Site schedules and financial planning information should be reviewed and updated on an ongoing basis (at a minimum on a monthly basis). **Note: All sites should be planned out through the deletion date as early as possible. By the time of the completion of a ROD, a site should have all planned dates entered into WasteLAN. As conditions change, the dates should be updated accordingly.**

Following is a summary of the SCAP planning cycle for non-Federal facilities:

II.E.1 Planning Year

- *Third Quarter* - Regions continue their site planning using WasteLAN. The Regions should focus on their individual pipeline, the overall goals and priorities of the program as identified in the GPRA annual performance plan, and how they can achieve their portion of the national effort given proposed resources. In June, HQ issues a Call Memorandum that outlines the process and the procedures for the upcoming work planning sessions. The memorandum will include the finalized AOA structure, GPRA annual program performance targets, and procedures to be used for developing the upcoming year's operating plan.
- *Fourth Quarter* - HQ pulls actual data for the current fiscal year and planning data for the next two FYs from WasteLAN on the fifth working day in September. In developing the FY operating plan (base budget), HQ will review financial data for the current and upcoming years as well as historical obligation trends. Funding needs will be totaled in each of the AOAs.

Regions can assume in FY 02 that their removal budget will be held at the same level as FY 01 and is unaffected by this proposal. Also, funding for a new start and on-going remedial actions will be unaffected by this proposal.

HQ will review the funds requested for the activities falling under the Pipeline Operations AOA and then calculate the percentage of funds that each Region is requesting compared to the total Pipeline Operations AOA. HQ will allocate 60 percent of these funds to the Regions [i.e., if a Region was to receive \$30 million as their percentage of the Pipeline Operations AOA, \$18 million (60 percent) would be allocated as part of the base budget.] Each Region's base budget will consist of the funds from 1) the straight-lined Removal AOA based on the FY 00 allocation and 2) 60 percent of its portion of the Pipeline Operations AOA.

To develop targets and allocate the remaining funds for the Pipeline Operations AOA, HQ will conduct Regional OU-specific pipeline analyses (upcoming year and one year out) and a historical trends analysis. The analyses will include a review of historical performance trends, a comparison of Region-specific targets to the national annual response program performance targets (e.g., 75 construction completions in FY 01), and a projection of resources needed to meet these targets. The results of the analyses will be used by the Regional Center Coordinators and the Planning, Analysis and Resources Management Center (PARM) when conducting Regional work planning negotiations as a tool to assess Region-specific target levels. The allocation of the remaining funds for the Pipeline Operations AOA (i.e., the remaining 40 percent) will be allocated based on the ability of a Region to contribute to the GPRA response program performance targets for FY 02/03. The Superfund Federal facilities response program will conduct a similar analysis and share the results with the Regional Superfund Federal Facility Program Managers.

OSRE reviews each Region's planned needs for the Superfund Enforcement AOA for the upcoming fiscal year along with historical budget utilization rates. The operating plan for each Region is based on a three year average utilization rate as a proportion of the national enforcement outlays over the same period, but does not exceed the region's planned needs. Sixty percent (60%) of the enforcement extramural resources are distributed to the regions in the first quarter of the FY. The remaining AOA balance will be distributed during the third quarter, based on each Region's performance and budget utilization rate.

- *October/November* - Regional work planning sessions will establish Regional budgets and targets (mid-year and end-of-year) and the operating plan (base budget plus increment) for the fiscal year.

II.E.2 Operating Year

- *Fourth Quarter (Planning Year) / First Quarter (Operating Year)* - Regional work planning sessions will establish proposed Regional budgets and targets (mid-year and end-of-year) and the operating plan (base budget plus increment) for the fiscal year. HQ will meet with the Division Directors to discuss the FY 02/03 Region-specific commitments and allocation of Regional funds based on the national GPRA annual program performance targets. The Superfund Federal Facilities Response Program will issue a memo that outlines Regional commitments and allocation of funds to both the Division Directors and the Superfund Federal Facility Program Manager. Enforcement extramural budget carryover amounts are calculated and the FY Regional enforcement budget allocation is finalized. Regions revise their final targets based on commitments that were not met the previous year.
- *Third Quarter* - At mid-year, HQ and the Regions will discuss Regional progress in achieving negotiated targets and Regional budget utilization (obligation rates). Based on these discussions, remaining funds will be allocated to the Regions to assure program targets are achieved. In some cases, this may involve a reallocation and shifting of resources among Regions.

Regions are required to manage their funds and operate within the annual budgets established. Non-RA funds within the Region's budget must be reprogrammed to meet unexpected needs.

II.F CHANGE CONTROL REQUIREMENTS

Stability in the SCAP process through the year is essential to the success of planning and accomplishment reporting/evaluation procedures. The following procedures are used to control changes to items in SCAP:

- Changes (including additions or deletions) to targets, measures, definitions, methodologies, planning processes, accomplishment reporting, financial management, or any other process described in this Manual must be presented by the Office Director for the program office proposing the change, and receive the comments/concurrence of OSRE, OERR, FFRRO, OSPA, and FFEO;
- All proposed changes must be sent to the Regions and all other program offices for review and comment prior to implementation; and
- The decision on whether to proceed with the proposed change must be documented in writing. Copies of all final decisions should be provided to all program offices and Regions. If the proposed change will be implemented, an addendum to the Superfund/Oil Program Implementation Manual may be issued.

II.G HQ/REGIONAL ROLES AND RESPONSIBILITIES

II.G.1 Maintaining Planning/Accomplishment Data in WasteLAN

Exhibit II.3 describes the HQ/Regional responsibilities for maintaining planning and accomplishment data in WasteLAN.

The Information Management Coordinator (IMC) is a senior position which serves as Regional lead for all Superfund program and WasteLAN systems management activities. The following lead responsibilities for Regional program planning and management rest with the IMC:

- Coordinate program planning, development, and reporting activities;
- Ensure Regional planning and accomplishments are complete, current, and consistent, and accurately reflected in WasteLAN by working with data sponsors and data owners;
- Provide liaison to HQ on SCAP process and program evaluation issues;
- Coordinate Regional evaluations by HQ; and
- Ensure that the quality of WasteLAN data is such that accomplishments and planning data can be accurately retrieved from the system.
- Ensure there is "objective" evidence to support accomplishment data entered in WasteLAN.

NOTE: Objective Evidence Rule: "All transactions must be supported by objective evidence, that is, documentation that a third party could examine and arrive at the same conclusion."

EXHIBIT II.3 HQ/REGIONAL SCAP AND WASTELAN RESPONSIBILITIES

Regional Responsibilities	HQ Responsibilities
Planning and scheduling all actions from site assessment and PRP search through NPL deletion Keeping planning and accomplishment data in WasteLAN up-to-date, including updating site schedules established at the ESI/RI stage and cost estimates for remedial actions when better planning data become available Reporting accomplishments in WasteLAN as they occur Entering and maintaining quarterly planning, budget, and accomplishment reporting for non-site specific activities Preparing change requests Tracking and maintaining the enforcement extramural budget and the Federal facilities budget Ensure there is "objective" evidence to support accomplishment data entered in WasteLAN	Negotiating final GPRA annual performance goals Entering the final budget into WasteLAN Determining the AOA based on planned activities in WasteLAN Entering and maintaining AOA data in WasteLAN Responding to Regional requests for changes in plans through the change requests process Utilizing WasteLAN to obtain budget and other Superfund site information to respond to special requests for information and planning data Communicating with Regions and HQ offices regarding changes in budget, SCAP process, Superfund/Oil Program Implementation Manual, and other program guidance that will impact WasteLAN, and subsequently implementing these changes in WasteLAN Ensure there is "objective" evidence to support accomplishment data entered in WasteLAN by performing periodic reviews of a random CERCLIS data sample.

The Budget Coordinator serves as the Regional lead for all Superfund program resource activities. The Budget Coordinator:

- Coordinates the planning, development and reporting of resources;
- Coordinates the planning and execution of Regional priorities;
- Communicates and implements national and Regional Superfund budget policies;
- Helps IMC to ensure Regional resources associated with accomplishments are complete, current, and consistent, and accurately reflected in WasteLAN; and
- Provides liaison to HQ on program issues.

With the implementation of WasteLAN, two roles, Data Sponsor and Data Owners, were identified for improving the quality of data stored in WasteLAN. Data Sponsors include the Senior Process Managers or program offices in HQ. Both HQ and the Regions are Data Owners. Following are the responsibilities assigned to each of these roles:

- ***Data sponsors***

- Identify data needs;
- Oversee the process of entering data into the system;
- Use data for reporting purposes;
- Conduct focus studies of the data entered;
NOTE: A "FOCUS STUDY" is where a data sponsor identifies a potential or existing data issue to a data owner (see below), IMC or other responsible source to determine if a data quality problem exists, and to solve the problem, if applicable. Focus studies can be informal via electronic messages.
- Provide definitions for data elements;
- Promote consistency across the Superfund program;
- Initiate changes in WasteLAN as the program changes;
- Provide guidance requiring submittal of these data; and
- Support the development of requirements for electronic data submission.
- Ensure there is "objective" evidence to support the accomplishment data entered in WasteLAN through identifying data requirements and checks to assure compliance by performing periodic reviews of a random CERCLIS data sample.

- ***Data owners***

- Enter and maintain data in WasteLAN; and
- Assume responsibility for complete, current, consistent, and accurate data.

- **OERR Regional Centers**

- Measure regional data entry quality and records management quality and assist regions with problems;
- Report data problems to Data Sponsors and responsible teams;
- Sample data quality and records management quality when visiting regions by tracking selected dates of a transaction in WasteLAN to the corresponding dates of the supporting paper document to ensure there is “objective” evidence to support accomplishment data entered in WasteLAN.

II.G.2 Program Evaluation

HQ and the Regions have different roles and responsibilities in Superfund program evaluation and management, as shown in Exhibit II.4.

**EXHIBIT II.4
EVALUATION RESPONSIBILITIES**

Regional Responsibilities	HQ Responsibilities
<p>Meet semi-annual program targets and solve performance problems when they arise</p> <p>Provide quarterly accomplishment and planning data to HQ through WasteLAN</p> <p>Maintain WasteLAN data quality at high levels for Superfund program and project management</p> <p>Negotiate performance standards that provide individual accountability for targets</p> <p>Assess Federal agency needs identified during the FEDPLAN and OMB Circular A-11 processes</p> <p>Participate in the Regional reviews</p>	<p>Provide guidance to the Regions for the quarterly reporting, the mid-year assessment, the year-end assessment, and Regional reviews</p> <p>Implement and report on follow-up action items from the Superfund mid-year assessment and Regional reviews</p> <p>Review performance data reported by the Regions and assist Regions having difficulties in meeting targets</p> <p>Conduct Regional reviews</p> <p>Continually assess program performance and analyze timeliness and quality of work</p> <p>Recommend resource reallocation based on Regional needs and performance</p> <p>Assure that all staff are informed of results of performance reporting</p> <p>Compare Federal agency budget authorities, obligations, and outlays to monitor cleanup activities</p>

The Superfund evaluation process provides managers with an opportunity to meet program objectives by:

- Examining program accomplishments;
- Analyzing and discussing issues that affect the successful operation of the Superfund program; and
- Initiating changes in program operations or reallocating/redirecting resources.

The strategy for assessing the performance of the Superfund program is comprised of the following:

- Establishing semi-annual and annual targets and planning measures;
- Semi-annual reporting of response, Federal facilities, and enforcement/program accomplishments and planning measures through WasteLAN;
- Semi-annual performance evaluation; and
- Regional reviews.

This strategy enables management to recognize high performance, concentrate Superfund resources in those Regions that demonstrate success, and provide training and technical assistance to those Regions that are experiencing difficulties.

In addition to the program management and assessment tools traditionally used by OSWER, Executive 12088, Federal Compliance and Pollution Control Standards, is applied to ensure that all necessary actions are taken for the prevention, control and abatement of environmental pollution associated with all facilities and activities under the control of every executive agency. The Executive Order requires the development of an annual plan, that provides for compliance with all applicable pollution control standards. The FEDPLAN is the tool that is used to identify, track and report on these environmental projects.

II.H PROCEDURES FOR ANNUAL TARGET SETTING

The process for developing GPRA annual performance goals and measures for a FY begins with the strategic plan. National annual performance goals are established to support the program's strategic plan and provide the basis for out year budget requests. All Regional targets are established in October/November only after work planning sessions with OERR, OSRE, FFRRO, FFEO, and the Regions. In the Regions, a joint review of commitments should be undertaken by the program office and ORC. The dates for pulling WasteLAN data that will be used in developing the proposed Regional operating plan, generating the Regional workload and budget, and work planning can be found in the Manager's Schedule of Significant Events presented at the beginning of this Manual.

The Region's focus in work planning should be on its individual pipeline (i.e., more site assessments or more construction completion oriented), the overall goals and priorities of the program including GPRA objectives and sub-objectives, and how it can achieve its portion of the national effort given proposed resources. HQ compares Regional plans with program goals and resource allocations. In addition, HQ reviews past Regional accomplishments, historical obligation trends, and planned durations/dollars to ensure that the Region is planning the appropriate amount of work given the dollars it is requesting. This provides HQ with a benchmark going into work planning on what the Region should be able to accomplish based on its unique pipeline status.

III.I WORK PLANNING

Regions are required to keep the planning and accomplishment data in WasteLAN current, complete, consistent, and accurate. Changes in planning information (schedules and funds) should be entered into WasteLAN within five days after the data owner [e.g., Remedial Project Manager (RPM)/On-Scene Coordinator (OSC)/Site Assessment Manager (SAM)] is aware of the need for the change.

II.I.1 Planning Process

Exhibit II.5 outlines the steps a Region must go through as part of its work planning responsibilities.

As a final check to ensure that planning data are current, complete, consistent, and accurate, Regions should routinely generate SCAP and Audit reports. At an absolute minimum, reports should be generated prior to HQ development of the proposed operating plan and in late June for internal review of the planning data in WasteLAN. These planning data should reflect any adjustments made to the annual plan.

As designated, HQ pulls SCAP reports from WasteLAN. The data in these reports serve as the basis for HQ/Regional work planning. HQ will perform all work planning sessions based on the information in WasteLAN on these pull dates.

EXHIBIT II.5 PROCEDURES FOR FY 02/03 TARGET SETTING

Month	Regional Responsibilities	HQ Responsibilities
March/April		
April/May		
May/June		
July/August/ September		
October/ November		

Month	Regional Responsibilities	HQ Responsibilities
November		

WasteLAN data quality problems that affect the SCAP report update shall be resolved prior to the work planning meetings. These problems are to be resolved on a Region-specific basis through telephone calls between HQ and the IMC or program manager.

II.I.2 WasteLAN Reports for Planning/Target Setting

Exhibit II.6 presents the WasteLAN reports used by HQ and the Regions in the establishment of Regional targets/measures. Following is a description of these reports:

- The *Site Summary Report* (SCAP-02) is used by EPA to display enforcement sensitive WasteLAN data for NPL and non-NPL sites.
- The *Response Financial Summary Report* (SCAP-04R), *Federal Facility Financial Summary* (SCAP-04F), and *Enforcement Financial Summary Report* (SCAP-04E) aggregate dollars by program area and provide both site-specific and non-site specific backup from WasteLAN. These reports should be used to compare the funding requests with the Regional budgets.
- The *OPA Measures Report* (SCAP-08) is used by EPA for tracking accomplishments and reporting progress made toward achieving program goals under the Oil Pollution Act (OPA).
- The *Site Assessment/Brownfields Report* (SCAP-13) is used by EPA for reporting estimates, plans, and accomplishments for SCAP measures. The information provided by this report is used in conjunction with the SCAP-14 report to encompass the entire range of targets and measures.
- The *Superfund Accomplishments Report* (SCAP-14 and 14F) is used by EPA to track targeting, planning, and accomplishment actions in support of the Response, Enforcement, and Federal Facility programs.
- The *GPRA Report* (SCAP-15) is used by EPA to track GPRA performance goals and measures in support of the Response program.
- The *Reconciliation (SCAP-14 Audit) Report* (SCAP-16) is used to extract all potential candidates for a SCAP-14 category and provide the user with the ability to determine the way in which the action will be selected or eliminated based on the values or lack of values in the Select Logic columns.
- The *Contract Planning (Bulk Funding) Report* (SCAP-21R) is used by the Regions to track and balance the tasking of their bulk funding obligations. The report calculates the difference between the Regions current bulk funding obligations and the associated tasking by Obligor Document Number (ODN) and Document Control Number (DCN).
- The *Cost Recovery Targeting Report* (ENFR-17) estimates potential targets for cost recovery.

EXHIBIT II.6
PLANNING/TARGET SETTING WASTE LAN REPORTS

SCAP-2:	Site Summary Report
SCAP-4E:	Enforcement Financial Summary Report
SCAP-4F:	Federal Facility Financial Summary
SCAP-4R:	Response Financial Summary Report
SCAP-08:	OPA Measures Report
SCAP-13:	Site Assessment/Brownfields Report
SCAP-14/14 F:	Superfund Accomplishments Report
SCAP-15:	GPRA Report
SCAP-16:	Reconciliation (SCAP-14 Audit) Report
SCAP-21R:	Contract Planning (Bulk Funding) Report
ENFR-17:	Cost Recovery Targeting Report

II.J REGIONAL ACCOMPLISHMENT REPORTING

Accomplishments data are entered into WasteLAN by the IMC, RPM, OSC, SAM, or other designated program staff (i.e., PRP search, cost recovery). Data on accomplishments should be entered into WasteLAN within five working days of the action occurring. **Only accomplishments correctly reported in WasteLAN will be recognized by HQ.** If a Region feels that it has correctly recorded an accomplishment that is not showing in the Superfund Accomplishments Report (SCAP-14), the GPRA Report (SCAP-15), Site Assessment Report (SCAP-13), or Enforcement Measures of Success Report (ENFR-62), please contact the appropriate HQ office.

Regions should perform data quality checks and make adjustments to WasteLAN if the database does not reflect actual accomplishments. In any event, Regions need to be sure the information reflected in WasteLAN is up-to-date and accurate.

Preliminary end-of-year accomplishments will be pulled on the fifth working day of September; it is the starting point for preparing for the end-of-year assessment in November. Since many senior managers and Congress request final accomplishments immediately following the end of the year, WasteLAN accomplishment reports will be pulled on the fifth and the tenth working days of October and reported in late October to mid-November (see Manager's Schedule of Significant Events at the beginning of this Manual for specific dates). This allows the Regions ample opportunity to review end-of-year financial data, ensure that all accomplishments are accurately reflected in WasteLAN, and determine which commitments were not met.

WasteLAN Reports for Accomplishment Reporting

Exhibit II.7 presents the WasteLAN reports HQ uses to evaluate Regional accomplishments. All are used for reporting and crediting accomplishments for targets and measures. Following is a description of these reports:

- The *SCAP Response Financial Summary Report* (SCAP-04R), *Federal Facility Financial Summary* (SCAP-04F), and *Enforcement Financial Summary* (SCAP-04E) aggregate dollars by program area and provide both site-specific and non-site specific backup from WasteLAN. These reports should be used to compare the funding requests contained in WasteLAN to the Regional budgets. Regions are prompted for "Approved" or "Alternate."
- The *Site Assessment/Brownfields Report* (SCAP-13) is used by EPA for reporting estimates, plans, and accomplishments for SCAP site assessment measures.

- The *Superfund Accomplishments Report* (SCAP-14 and 14F) is used by EPA to track targeting, planning, and accomplishment actions in support of the Response, Enforcement, and Federal Facility programs.
- The *GPRA Report* (SCAP-15) is used by EPA to track GPRA performance measures in support of the response program.
- The *Reconciliation (SCAP-14 Audit) Report* (SCAP-16) is used to extract all potential candidates for a SCAP-14 category and provide the user with the ability to determine the way in which the action will be selected or eliminated based on the values or lack of values in the Select Logic columns.
- *Settlements Master Report* (ENFR-3) - This report lists all settlements to date. Data are divided by settlement category and summarized by FY, Region, and remedy.
- *Administrative/Unilateral Orders Issued* (ENFR-25) - This report lists AOs and UAOs that have been issued.
- *Measures of Success Report* (ENFR-62) - This report is intended to allow Regions to report progress on measures of success relating to enforcement fairness and trust fund stewardship.
- *Environmental Indicators Report* (ENVI-01) - This report provides EPA Regional management with a tool to easily monitor environmental indicators (EI) data.

EXHIBIT II.7
PROGRAM EVALUATION WASTELAN REPORTS

SCAP-4E:	Enforcement Financial Summary Report
SCAP-4F:	Federal Facility Financial Summary
SCAP-4R:	Response Financial Summary Report
SCAP-13	Site Assessment/Brownfields Report
SCAP-14/14 F:	Superfund Accomplishments Report
SCAP-15:	GPRA Report
SCAP-16:	Reconciliation (SCAP-14 Audit) Report
ENFR-3:	Settlements Master Report
ENFR-25:	Administrative/Unilateral Orders Issued
ENFR-62:	Measures of Success Report
ENVI-01:	Environmental Indicators Report

II.K HQ EVALUATION OF REGIONAL PERFORMANCE

Accomplishment data associated with targets/measures are pulled from WasteLAN at the close of business of the fifth working day of the quarter; **therefore, it is necessary that the Regions update their accomplishments data as accomplishments occur, but in no case later than quarterly prior to the fifth working day pull date. HQ management tracks and bases its evaluation of Regional program performance on these data.** The data are pulled on a selected number of key indicators of progress in the Superfund program (e.g., construction starts and completions, removal completions, site characterization starts, response settlements and referrals, RODs, and cost recovery activities). These numbers are the official numbers used in any reports of progress given to the Administrator, Deputy Administrator (DA), AAs, Congress, and the media. Detailed HQ management evaluation occurs at two points during the FY: after the second quarter (mid-year assessment) and after the fourth quarter (end-of-year assessment). (See Exhibit II.8.) In addition, HQ will be conducting Regional reviews in FY 02/03.

II.K.1 Mid-Year Assessment

The purpose of the mid-year assessment is to evaluate the utilization of Regional programmatic budgets. Specifically, the mid-year assessment will be used to:

- Provide both HQ and the Regions with an opportunity to assess performance;
- Provide data to HQ and the Regions to make decisions on distribution of remaining budget;
- Consider the impact of Regional program performance on the Superfund pipeline;
- Work with Regions experiencing difficulty in meeting their targets; and
- Identify trends in program performance and adjust program management strategies accordingly.

On the fifth working day of April, second quarter SCAP data are pulled from WasteLAN. Following the mid-year assessments, OERR, FFEO, FFRRO, OSRE, and OSPS Directors brief the AA SWER or AA OECA on the steps being taken to ensure the accomplishment of annual targets. To ensure that these actions are implemented, HQ will track follow-up items and reallocate resources. The results of the mid-year assessment can result in increases or decreases to third or fourth quarter AOAs based on Regional GPRA performance and obligation rates. The measure of a Region's ability to meet their targets will be considered in October/November when final proposed FY commitments and Regional budgets, respectively, are established for the year.

II.K.2 End-of-Year Assessment

Before the end of the fourth quarter, there is a preliminary pull for end-of-year accomplishments (the first week of September). This pull is used to project end-of-year accomplishments. It is important to stress that this is only a projection and that the actual pulls, on the fifth and tenth working days of October, are likely to be somewhat different than the projected numbers. Since many Superfund managers and Congress request final accomplishments immediately, Regions should make every attempt to update WasteLAN at the earliest possible date and, in no event, any later than the fifth working day after the end of the FY.

EXHIBIT II.8
THE REGIONAL EVALUATION PROCESS

1st Quarter	<ul style="list-style-type: none"> • Pull WasteLAN Reports on GPRA/Program Accomplishments
2nd Quarter Mid-Year Assessment	<ul style="list-style-type: none"> • Pull WasteLAN Reports on GPRA/Program Accomplishments and Internal Measures • Perform Regional Mid-Year Reviews • Evaluate Program Status • Brief Senior Management
3rd Quarter	<ul style="list-style-type: none"> • Pull WasteLAN Reports on GPRA/Program Accomplishments • Report on Progress of Regions having difficulties meeting Targets
4th Quarter End-of-Year Assessment	<ul style="list-style-type: none"> • Pull WasteLAN Reports on GPRA/Program Accomplishments and Internal Measures • Develop Senior Management Reports Package • Evaluate Annual Performance Status • Evaluate Annual Performance and produce National Progress Report • Provide input into next FY Work Planning • Brief Senior Management Process

In November, HQ conducts the official end-of-year assessment. This assessment is an integrated analysis of program performance activities for the year. The purpose of the end-of-year assessment is to emphasize pipeline issues (e.g., slipped targets and their impact on commitments for the next year). ***Missed targets may have resource implications for the next FY.*** The end-of-year review also notes progress toward implementing strategies identified in the mid-year assessment, and identifies Regions that might require additional HQ assistance as the new FY begins.

HQ considers the end-of-year assessment in developing the final GPRA annual performance goals. In this way, the results of the end-of-year assessment have a double impact.

II.K.3 Regional Reviews

Before the beginning of the FY, the program offices and Regions identify key program areas and issues in the strategic plans or individual program management guidance. Those issues that HQ program managers believe to be important to the general success of the program's mission are selected for discussion during the Regional reviews.

II.K.4 Management Reporting

The following sections provide a brief description of the reports available to support Superfund program management.

a. Superfund Management Reports

The implementation of an integrated WasteLAN data base and the improvement of WasteLAN data quality led to the development of a series of senior management reports. These management tools are designed to supplement conventional quarterly accomplishment reporting by providing a more comprehensive examination of program activity. The format and content of the reports package has evolved over time to address a variety of project needs, providing EPA senior managers with summary graphic reports and backup site detail information.

OSWER Directive 9200.3-14-1 G-P

The FY 02/03 packages provide graphical representations of the status of targets and accomplishments, as well as analytic summaries of key aspects of the program including: status and duration of events; trend analysis of PRP involvement; cost recovery candidates; base closure joint indicators of progress; and the current status of negotiations, settlements, and litigation.

The reports, produced semi-annually, illustrate the progress being made by the Agency in both the movement of projects through the Superfund pipeline and in the trend toward increased involvement by PRPs. The semi-annual packages produced by OERR are divided into three distinct sections:

- *Report I: SCAP Estimates and Accomplishments* - This section graphically displays specific program targets and accomplishments by Region, the percent of annual targets achieved in the major response and enforcement program areas, and annual target and accomplishment totals by activity for each Region.
- *Report II: Trends Analysis* - These graphs present the duration analyses of pipeline events, including RI/FS, RD, and RA durations, durations from proposed to final listing, and proposed listing to first RI/FS start, first RD start, and first RA start, for both fund and enforcement. Users can request that the duration reports be run for a given FY or Region.
- *Report III: Superfund Historical Performance* - These reports provide graphical presentations of progress made at NPL and non-NPL sites. Various information, including site, enforcement, budget, and project data, are used to present an overall picture of the Superfund program activities.

Additional management reports produced by OSRE include:

- *Cost Recovery Targeting (ENFR-17)* - This report estimates potential targets for cost recovery.
- *ROD Amendment and RD/RA Negotiations Report (ENFR-22)* - This report is used to track RD/RA negotiation progress. The report is categorized into RD/RA negotiations started from signed ROD and No RD/RA negotiations started from signed ROD.

Additional management reports produced by FFRRO include:

- *BRAC Pipeline Report (BRAC-01)* - This report lists the pipeline actions within the current FY for any BRAC site.
- *Environmental Baseline Study (EBS) Report (BRAC-02)* - This report lists all Federal facility sites with EBS starts or completions within the FY.
- *Finding of Suitability to Transfer/Lease (BRAC-03)* - This report lists all sites for which EPA concurs on a finding of suitability for transfer/lease within the current FY.

b. Annual Reporting Requirements

Commencing March 31, 2000, and each year thereafter, the Agency is required to submit to the President and Congress a GPRA annual performance report that summarizes the program performance for the previous fiscal year. Specifically, each report will (a) review the success of achieving the program's objectives and sub-objectives during the fiscal year; (b) evaluate the annual performance plan for the current fiscal year relative to the performance achieved toward the performance objectives and sub-objectives in the fiscal year covered by the report; and (c) explain and describe where a performance objective/sub-objective has not been met, why it was not met, and those plans and schedules for achieving it.

II.L TARGET AND DEFINITION CHANGE REQUESTS

After targets have been finalized and funding levels developed, the SCAP process provides the flexibility to modify plans during the year. Modifications to planned GPR A annual performance goals are termed change requests. ***Regional requests for changes to targets established in the annual plan must be forwarded in writing from the Regional Division Director to HQ OERR, OECA, FFRRO, or OSPS, Office Directors, as applicable, when the Region is unable to make a site substitution for a target.***

Any exceptions to the accomplishment definitions contained in the Appendices to this Manual are considered target definition changes. Regions also should note that changes made in WasteLAN to site schedules and other planning data will not automatically result in changes to targets.

Target changes that modify the Region's AOA require a financial change request. In these situations, the financial change request becomes the target change request. Chapter III outlines the change request procedures.

Although Regions have the flexibility to alter plans, they are still accountable for meeting the targets established at the beginning of the FY. Changes to commitments should not be made simply because targets will not be met. Regions should discuss with HQ during the mid-year reviews any issues that may affect the meeting of negotiated annual targets.

In some cases, however, changes to targets may be necessary and may be revised under the following conditions:

- Major, unforeseen contingencies arise that alter established priorities (i.e., Congressional action, natural disasters);
- Major contingencies arise to alter established Regional commitments (i.e., State legislative action);
- Measure or definition in system is creating an unanticipated negative impact;
- Major shifts in project approach; or
- Need to address newly identified site which represents a significant human health or ecological risk.

OERR, OECA, FFRRO, and OSPS require that all target and definition changes be submitted to HQ no later than July. Optimally, such requests should be submitted during discussions with HQ during mid-year reviews.

Regions should not initiate any obligations against change requests until the HQ Office of the Comptroller (OC) and the Director of the appropriate office approve the revised AOA in IFMS. The site back-up in WasteLAN should be revised by the Region if the change is approved.

Maintaining the Planning Estimates/Targets

Regions are responsible for initiating the work planning process and for entering the preliminary and final targets into WasteLAN. Prior to work planning sessions with HQ, Regions can use the Regional Planning screen to identify which sites meet the planning logic as potential accomplishments for the upcoming FY. From this universe of sites (shown in red as Planning Data on the Regional Planning screen), Regions can identify primary candidate sites—those that are most likely to be accomplished. After identifying primary candidates (shown in blue on the Regional Planning screen), the Regions can then use the target lockout feature found on the Regional Planning screen to copy the primary candidate number to the Planning Estimates/Targets screen. This number is used as a starting point in identifying the Region's planning estimates/targets during work planning sessions. After work planning sessions are completed, Regions use the Planning Estimates/Targets screen to make any necessary changes. Once changes have been made and final targets/planning estimates are reviewed by HQ, HQ will "lock out" Regions (i.e. Regions will not be able to make any

changes to these numbers). This final number is shown in red on the Accomplishments Tracking screen as the Planning Estimates/Target number. During the FY if changes have been made to the number of target commitments approved, HQ will “unlock” the target numbers allowing the Region to make the approved change(s), and then “relock” the screens.

In general, HQ does not require site-specific targeting. The three exceptions are Cost Recovery actions at sites with potential Statute of Limitations (SOLs) so that they will be addressed prior to the expiration of the SOL, *de minimis* settlements, and PRP Oversight Administration for each enforcement agreement. Changes to sites identified as targets for these measures require HQ approval.

II.M SPECIAL REPORTING TOPICS

II.M.1 Brownfields

EPA’s Brownfields Program is funded using Brownfields appropriations under CERCLA authorities. While EPA’s Brownfields program has many components, planning and reporting of Targeted Brownfields Assessments (TBAs) component will be recorded in WasteLAN system. However, Brownfields TBAs are not considered part of the CERCLIS system nor a part of the SCAP process. Regions must enter Brownfields TBA annual planning data, by quarter, for “Targeted Brownfields Assessments” and “Number of Brownfields Properties Addressed by TBAs.” Annual planning data should be entered in October of each fiscal year. On a monthly basis, the Regions are required to enter and reconcile accomplishment data in WasteLAN in two different modules: in the Accomplishments Tracking Screens and in the Brownfields Module.

II.M.2 Site Assessment

As the nature of site assessments change, new reporting and accountability challenges to accurately portray the extent of State, Federal, and local government site assessment activities need to be addressed. Traditional CERCLA-reported site assessment accomplishments, including integrated assessments, should continue to be entered into WasteLAN when they occur. As Regions provide States flexibility in Cooperative Agreement applications and work plans by expanding the definition of types of assessment activities to be performed, the States also need to be accountable for the activities performed and provide quarterly or annual reports of the number of sites assessed, types or nature of assessments performed, and assessment results. Management systems at the State and probably Federal level will be needed to provide the accountability necessary and, also, to identify program accomplishments.

II.M.3 Base Closure

EPA is providing resources to support the President’s Fast Track Cleanup program. To facilitate EPA’s justification of these resources, Regions are required to support several data points for closing bases. WasteLAN has been modified to include these items.

II.M.4 Pre-SARA Sites Initiative

The Superfund program has developed a Pre-SARA site initiative to promote the resolution of issues which have delayed the completion of construction at hundreds of sites across the country. Prior to the enactment of the Superfund Amendments and Reauthorization Act of 1986 (October 16, 1986), EPA listed 711 sites (including 4 Federal facility sites) on the National Priorities List. By the end of FY 2001, construction was completed at all but 220 of these sites. OERR's initiative calls on the Regions to place a priority on the completion of construction at these sites by identifying the issues delaying completion of construction, developing a site-specific schedule for resolution of issues, leveraging management, staff and other resources toward these sites, and tracking and reporting site progress. Superfund will track the progress of Pre-SARA sites largely via the WasteLAN database, since the system contains both the projected and actual dates for construction completion.

II.M.5 Mega Sites

Generally, a site is considered to be a mega-site if the combined extramural, actual and planned, removal and remedial action costs incurred by Superfund or by PRPs are greater than \$50 million. The mega-site designation may be applied to all federal and non-federal facility NPL and non-NPL sites. For the purposes of reporting in CERCLIS, a site is defined as a mega-site (MS) if:

- the cumulative value of the extramural capital costs of all selected remedies (as expressed in decision documents such as RODs, ROD amendments, or action memoranda) exceeds \$50 million; OR
- the cumulative value of all PRP or Federal Facility actual and expected extramural capital costs (as memorialized in documents such as settlements, orders, or MOAs) for removal or remedial action response activities (excluding long-term response) at the site exceeds \$50 million; OR
- the cumulative value of net actual extramural obligations for Fund-financed removal and remedial actions (excluding LTRA) at the site exceeds \$50 million; OR
- the cumulative value of post-ROD (or post-action memorandum), removal and remedial action obligations (excluding LTRA) planned in CERCLIS for the selected remedies at the site exceeds \$50 million; OR
- the cumulative value of any combination of the above costs exceeds \$50 million.

A site is defined as a potential mega-site (MP) if the Region, using its best judgment, expects that the total costs of removal and remedial actions will exceed \$50 million, but the documentation of actual or expected costs (e.g., through decision or settlement documents or actual obligations) does not currently exist. Once such documentation is developed, the site should be reclassified as MS. Conversely, if new information suggests that the site is not a mega-site, the designation of MP or MS should be removed. During annual workplanning discussions between Regions and Headquarters, the Regions will confirm these designations on a site-specific basis.

II.M.6 Criteria for Credit of Remedial Pipeline Activities at Superfund Alternative Sites

Please see appendices A and B.

II.N GENERAL WORK PLANNING AND REPORTING REQUIREMENTS

The following section discusses some general work planning and reporting requirements of the various Superfund offices.

II.N.1 Data Lockout on Historical Accomplishments

WasteLAN has a historical accomplishment lockout feature that logs and controls changes to Superfund data sensitive to Congressional inquiry. This feature uses the Accomplishment Change Log Screen and reports that list all changes that have been made to historical accomplishments data. A Regional manager for Superfund shall approve either in writing, or using the management review function in WasteLAN, each data change made by a Region to locked historical data. Only Regional IMCs, individuals designated by the IMC and Remedial Project Managers (RPMs), shall have access/authority to change/add/delete their own Region's data via a WasteLAN Smart Screen once written approval has been received. All other Regional personnel will be denied access to the change system. Written approval documents or records of approval via WasteLAN management review must be maintained by the IMC for the duration of the life cycle of the data changed (up to seven years).

Please Note: *In Regions that use Management Review*, RPMs will be able to make changes to prior year accomplishment data via the Accomplishment Change Log Screen. All changes made by RPMs will, however, need to be approved by the Regional Manager Reviewer.

Each Region will establish a policy or procedure to ensure that the appropriate people have knowledge of and approve of the change. All approval documents must bear a System Generated Reference Number or Document Number.

II.N.2 Data Validation and Verification

GPRA requires that an agency address its verification and validation procedures for performance data in the annual performance plan. WasteLAN data verification and validation procedures were incorporated as part of Superfund programs' submission to the EPA's annual performance plan.

A key component of WasteLAN verification/validation procedures is the Regional CERCLIS Data Entry Internal Control Plan. The internal controls for WasteLAN data were previously cited as a weakness by the Office of the Inspector General. In response to this weakness, the Regions developed and submitted control plans in 1994. The control plans include: (1) Regional policies and procedures for entering data into WasteLAN; (2) a review process to ensure that all Superfund accomplishments are supported by source documentation; (3) delegation of authorities for approval of data input into WasteLAN; and (4) procedures to ensure that reported accomplishments meet accomplishment definitions. Also, Regions documented in their control plans the roles and responsibilities of key Regional employees responsible for WasteLAN data (e.g., Regional project manager, information management coordinator, supervisor, etc.), and the processes to assure that WasteLAN data are current, complete, consistent, and accurate. Regions will address the following specific actions by name to assure that essential data are not missing from the database: (1) NPL Action Memos (RF & AM); Decision Document Developed; (2) NPL ROD, Decision Document Developed; (3) Non-NPL Action Memos (RF & AM), Decision Document Developed; (4) RA Start (FUND), PRP RA Start; (5) Remedial Actions, Start of Response Actions/Activities; and (6) Limited Remedial Actions, Start of Response Actions/Activities.

With the increased emphasis on verifiable and validated data by GPRA, the program offices are requesting that the Regions review their current CERCLIS Data Entry Internal Control Plans and update their control plans according to the requirements listed above.

In addition, Regions are required to submit to their Regional Superfund Records Center the document that constitutes or justifies an accomplishment date (actual start or actual complete) recorded in WasteLAN. (Documentation requirements for these dates can be found in the Appendices to this Manual in the "Definition of Accomplishment" section of the applicable target or measure.) When submitting the documentation to its record center, the Region should provide the target/measure category and the WasteLAN Operable Unit (OU)/action name/sequence number. The Regional Records Center is to include these SCAP data with the document index data, and provide the document index number from its tracking system for entry into WasteLAN associated with the applicable accomplishment date.

II.N.3 Action Lead Codes

Action lead codes identify the entity performing the work at the site. Exhibit II.9 shows the valid project/action lead codes in WasteLAN.

A lead code must be placed in WasteLAN for all Actions. Only the leads that are valid for the chosen Action can be entered. Leads are not required for SubActions. Regions have the ability to code the lead for project support activities (e.g., community relations, support agency assistance, etc.) based on Regional preference. All enforcement actions (e.g., orders, decrees, PRP searches, etc.) performed by EPA should have a lead of "FE" (Federal Enforcement). All enforcement actions conducted by the State should have a lead of "SE" (State Enforcement). WasteLAN should not contain planned obligations for projects with "SR" or "SN" leads. No funds will be provided for activities with these leads.

The Agency acknowledges that States can and have assumed the lead role in reaching an agreement with the PRPs for response activities at NPL sites without negotiating a cooperative agreement or other formal agreement with EPA (SR-lead). However, the NCP has determined that in the absence of a formal agreement the State will not be officially recognized as the "lead agency" for the project and EPA will not concur on the remedy selected.

EXHIBIT II.9: ACTION LEAD CODES IN WASTELAN

Lead	Definition
F	Fund-financed response actions performed by EPA (applies to response actions)
RP	PRP- financed response actions performed by the PRP under a Federal order/ CD (applies to response actions)
S	Fund- financed response actions performed by a State. Money provided through a Cooperative Agreement (CA) (applies to response actions)
PS	PRP-financed response actions performed by PRP under a State order/ CD with PRP oversight paid for or conducted by EPA through an EPA CA with the State, or, if oversight is not funded by EPA, a State Memorandum of Agreement (SMOA) or other formal document between EPA and the State exists which allows EPA review of PRP deliverables (applies to response actions)
SN	State-financed (no Fund dollars) response actions performed by the State (applies to response actions)
SR	PRP response under a State order/ CD and no EPA oversight support or money provided through a CA and no other formal agreement exists between EPA and the State (applies to response actions)
CG	Work performed by the Coast Guard - Limited to removals (applies to response actions)
MR	Work performed by PRP under a Federal CD with an agreement that the Fund will provide some reimbursement to the PRP (preauthorization for mixed work). (applies to response actions)
SE	Enforcement actions performed by a State. Money provided through a CA or, if not funded by EPA, a comparable enforcement document exists (applies to RODs and enforcement actions)
FE	Enforcement actions performed by EPA or work done by enforcement program at private or Federal facilities sites (applies to RODs and enforcement actions). Historically (Pre-FY 89) applied to RI/FS and RD response actions.
EP	Response actions performed by EPA using in-house resources
FF	Response actions performed by the Federal facility with oversight provided by EPA and/or the State at sites designated as Federal facilities on the NPL (also applies to RODs at Federal facilities)
TR	Indian Tribal Governments
CO	Community Organization (Only valid for Community Involvement Activities)
OH	Other
SD	State Deferral is a PRP- or State-financed response action at a non-NPL or proposed NPL site overseen or conducted by the State pursuant to a deferral agreement with the Region.
SC	State ROD with EPA concurrence
SW	State ROD without EPA concurrence

Lead	Definition
SA	PRP financed actions from a special account performed by EPA, where the majority ¹ of funding is disbursed from a special account (applies to response actions) .
SG	PRP financed actions from a special account performed by the United States Coast Guard, where the majority ¹ of funding is disbursed from a special account - Limited to removals (applies to response actions) .
ST	PRP financed actions from a special account performed by tribal governments, where the majority ¹ of funding is disbursed from a special account (applies to response actions)
SS	PRP financed actions from a special account performed by a state, where the majority ¹ of funding is disbursed from a special account. Money provided through a Cooperative Agreement (CA) (applies to response actions)

II.N.4 Lead Changes

A takeover or lead change occurs when the entity performing a response action changes after the action has started and credit has been given. Typically, this occurs when a settlement with the PRP had been reached after the action started. It may also occur when the Fund assumes an RP-lead project because of non-compliance with an Administrative Order (AO) or Consent Decree (CD).

In order to avoid delays resulting from PRPs assuming the lead during a discrete phase of the project (a takeover), a policy has been established that limits lead changes from EPA to PRPs in the middle of a phase of the Superfund process, except in situations where the change will not cause undue delays (OSWER Directive 9800.1-01, *Limiting Lead Transfers to Private Parties During Discrete Phases of the Remedial Process*, November 14, 1991). The policy applies to lead changes from EPA to PRPs only, not EPA takeovers of PRP work or lead changes involving States.

It is expected that much of the early site assessment activities will be Fund-lead. However, response lead changes (i.e., changeovers) can occur at any of the following points in the process:

- Prior to development of an EE/CA for a NTC removal action;
- Prior to the ESI/RI or RI/FS;
- Prior to the FS if the RI and FS are being done separately;
- After the ROD is signed and prior to beginning the RD or RA; and
- Prior to RA contract solicitation, when funding the RA would have significant implications for the Fund and when no significant delays will occur.

¹ Majority is defined to mean that the contribution from the Special Account for the total response cost (including direct and indirect costs) would meet or exceed the amount contributed by the largest non-PRP entity (i.e., EPA or State, where applicable). For example for a remedial action, based on the total estimated response cost, if 50% of that cost is derived from a Special Account, and 45% of the response cost is paid for out of Fund monies, and the State pays the remaining 5% share of the response cost, the majority of the response cost is being paid out of the Special Account. The appropriate use of Special Account funds is provided in the "Guidance on Key Decision Points in Using Special Account Funds" dated September 28, 2001.

When circumstances warrant passing the lead to PRPs during a phase of cleanup, steps should be taken to minimize potential causes of delay. For example, if PRPs assume the lead during the RI/FS, they should be given a limit of 60 days to enter into an Administrative Order on Consent (AOC) for performing the work.

If a PRP is allowed to take over a response action after dollars have been obligated, the Region should retain the funds needed for oversight of the entire PRP action and deobligate the rest. Funds that are deobligated may be replaced in the Region's AOA and used in accordance with the flexible funding priorities outlined in Chapter III.

When dollars were originally obligated for Fund-financed actions and a takeover occurs, Regions will have to request a change in the account number through their Regional Financial Management Office (FMO). The Action code within the account number changes if the Agency is acting in an oversight role as opposed to performing the response action.

RP-lead projects that are deficient or where the PRPs are recalcitrant may be addressed by the response program. If the project requires substantial Fund involvement to correct, it should be coded as a takeover in WasteLAN.

If a takeover of an action does occur, a new Action must be created in WasteLAN. A takeover does not create a new OU. The completion date of the original Action must be the same as the start date of the new Action. Takeover/Phased Indicators must be entered with both Actions. The "Original Action Takeover (TO)" indicator is used to flag the original Action which has the change in lead, whereas a "New Action resulting from Takeover (TN)" indicator is used to flag the new Action.

On rare occasions, an action that has been taken over requires an additional lead change. For example, EPA reaches settlement with the PRPs after a Fund-financed action has begun. After the PRPs start work, EPA experiences problems with the PRPs in meeting deadlines or in the quality of the work. As a result, EPA makes a decision to takeover the PRP-financed action. The steps to be taken to indicate this scenario in WasteLAN are as follows:

- 1) A new Action is added to WasteLAN at the same OU. In our example, a new combined RI/FS with a 'F'- lead would be added.
- 2) The start date of this new Action is the date of the takeover.
- 3) A Takeover/Phased Indicator of "New Action Resulting from Takeover (TN)" is entered with the new Action.
- 4) The completion date of the latest action that was taken over is the same as the start date of the new Action (date of the takeover).
- 5) The Takeover/Phased Indicator of the latest action that was taken over is changed from a "New Action Resulting from Takeover (TN)" to a "Takeover of an Action Taken Over (TT)".

Exhibit II.10 provides an example of the WasteLAN coding. In this situation, no changes are made to the original action.

**EXHIBIT II.10
CODING OF TAKEOVERS**

Action Takeover							
OU	Action Name	Seq.	Lead	Actual Start	Actual Comp	Takeover/ Phased Indicator	Comments
01	Combined RI/FS	1	F	8/1/97	9/1/97	TO	Fund-financed Action being taken over by PRPs
01	PRP RI/FS	1	RP	9/1/97	12/1/97	TT	PRP Action initiated and taken over by Fund
01	Combined RI/FS	2	F	12/1/97		TN	Fund-Financed Action initiated

II.N.5 Action Qualifiers for Site Assessment Actions

Site screening and assessment decisions are made upon completion of each site assessment action. These decisions identify how the Region will proceed with site response and are recorded in WasteLAN as action qualifiers (Qualifiers). These decisions include:

a. No Further Remedial Action Planned (NFRAP)

No further Superfund remedial assessment work will be taken at a site with a NFRAP determination [Qualifier = (N) No Further Remedial Action Planned] unless new information warranting such action is presented to EPA.

NFRAP decisions should not be confused with WasteLAN archiving. NFRAP decisions are made from a site assessment perspective only; they simply denote that further Superfund NPL assessment work is not required based on currently available information. In contrast, the archival of WasteLAN sites is made only when no further Superfund interest exists at a site. This means that sites are not archived if there are planned or ongoing removal or enforcement activities or if other Superfund interest still exists, even if a NFRAP decision was made during site assessment activities.

b. Further Evaluation

Upon completion of each site assessment action, the Region may determine that additional, more complex evaluation activities are required to determine whether or not the site should be pursued for placement on the NPL. A decision to conduct further evaluations at a site is recorded differently in WasteLAN depending on what site assessment activity is being performed.

For PAs, SIs, Site Reassessment, Combined PA/SI, and SIPs, further evaluation is denoted by either making a decision of higher priority [Qualifier = (H) High], or lower priority [Qualifier = (L) Low] for further evaluation. For ESIs and ESI/RIs, further evaluation is denoted by the decision of lower priority for further evaluation or to recommend the site for HRS scoring [Qualifier = (G) Recommended for HRS Scoring].

Further evaluation activities upon completion of a HRS Package consist of HQ quality assurance and ultimately a decision on whether to propose the site to the NPL [Qualifier = (O) Site is being considered for proposal to the NPL].

c. Perform a Removal

Upon completion of PAs, SIs, SIPs, ESIs or ESI/RIs, the Region may determine that a time-critical or non-time critical (NTC) removal is necessary. The decision recorded for these actions are “Referred to Removal, Needs Further Remedial (Qualifier = F)” or “Referred to Removal, No Further Remedial (Qualifier = W).”

d. Defer the Site to RCRA (Subtitle C) or the NRC

Upon completion of PAs, SIs, ESIs, or SIPs at non-Federal facilities, the Region may determine that the site is excluded from Superfund consideration under policy, regulatory, or legislative restrictions and defer it to either the RCRA program [Qualifier = (D) Deferred to RCRA (Subtitle C)] or to the NRC [Qualifier = (DN) Deferred NRC].

e. Sites addressed as part of existing NPL sites

Upon completion of Site Assessment activities, such as PAs, SIs, SIPs, ESIs, or ESI/RIs, the Region may decide that a site is best addressed as part of an existing NPL site. This would be done when contamination at a non-NPL site is being addressed by cleanup actions at an existing NPL site. This most frequently occurs at Federal facilities and sites with an area-wide groundwater contamination problem resulting from multiple sources. In this situation, the NPL site is considered the 'parent' and the non-NPL site is referred to as the 'child'. The decision to address a site as part of an existing NPL site requires the following information in WasteLAN:

- Upon completion of the site assessment activity that led to the decision to combine the two sites, the Region should enter a qualifier of 'Addressed as part an existing NPL site' (A) at the child site;
- The 7-digit Site ID number of the parent site must be entered into the Parent Site ID field (Site Parent ID) for the child site;
- The 7-digit Site ID number of the child site must be entered into the Child Site ID field (Site Child ID) for the parent site; and
- The NPL Status for the child site must be changed to 'Site is part of NPL Site' (A).

After a site is collapsed into the parent site, no further response work should be recorded at the child site. Instead, any further response work performed at that site should be recorded under the existing parent NPL site, possibly as a separate operable unit.

f. Sites addressed as part of other existing non-NPL sites

Upon completion of a site assessment activity, it is also possible for the Region to decide that a site is best addressed as part of another existing non-NPL site. The decision to combine multiple non-NPL sites requires the following information in WasteLAN:

- Upon completion of the site assessment activity that led to the decision to combine the two sites, the Region should enter a qualifier of 'Addressed as part of another non-NPL site' (code pending) at the child site;
- The 7-digit Site ID number of the parent site must be entered into the Parent Site ID field (Site Parent ID) for the child site;
- The 7-digit Site ID number of the child site must be entered into the Child Site ID field (Site Child ID) for the parent site; and
- The Non-NPL Status for the child site must be changed to 'Addressed as part of another non-NPL site' (code pending) .

After a site is collapsed into the parent site, no further actions should be recorded at the child site. Instead, any further assessment or response work performed at that site should be recorded under the existing parent site. If the parent site becomes a NPL site (NPL Status P, F, D, R, W), WasteLAN should be updated as described in section *d.* above.

II.N.6 Record of Decision (ROD)

A ROD is prepared after completion of public comment period on the FS and proposed plan for an early action (remedial authority) or long-term response action. The ROD identifies the Agency's selected remedy.

a. ROD Changes

After a ROD is signed, new information may be generated that could affect the remedy selected. Three types of changes can occur: Other Remedy Change, Explanation of Significant Differences, and ROD Amendment. All of these documents need to be sent to the below HQ address within 5 (five) days after signing:

US EPA
Attn. Superfund Docket, 5202G
Ariel Rios Building
1200 Pennsylvania Avenue N.W.
Washington DC 20460

i. Other Remedy Changes Document Non-Significant Remedy Changes

Non-significant remedy changes fall within the normal scope of changes occurring during the Remedial Design/Remedial Action (RD/RA) or limited RA. These changes typically result from value engineering. This may cause minor changes in the type/cost of materials, equipment facilities, services, and supplies. When such changes do not significantly affect the scope, performance, or cost of the remedy, they are considered minor or non-significant.

Other Remedy Changes should be documented in a Note to File or Memorandum to File, titled "Other Remedy Change." Copies of these documents shall be placed into the Administrative Record (AR), and need to be mailed to the above address at HQ. Since the document is placed into the AR, it is available for public review. A formal public comment period, public meeting and responsiveness summary are not needed. An Other Remedy Change is not a new ROD and should not be coded as such in WasteLAN. It should be entered as a SubAction to the ROD (Action Name = Record of Decision and SubAction Name = Other Remedy Change). Other Remedy Change data are entered into WasteLAN at the time the document is signed. Response action and cost data only need to be entered when they change. Other Remedy Changes are tracked as an internal reporting measure.

ii. Explanation of Significant Differences (ESDs) Document Significant Changes to a Component of a Remedy

Significant changes to a component of a remedy generally are incremental changes to the hazardous waste approach selected for the site (i.e., a change in timing, cost and implementation). These changes do not fundamentally alter the overall approach intended by a remedy. When significant changes are made to a component of a remedy, an Explanation of Significant Differences (ESD) should be prepared.

A copy of the ESD is placed into the AR, and a copy needs to be mailed to the above address at HQ. The ESD is made available to the public for review. A formal public comment period, public meeting, and responsiveness summary are not required. While the ESD is being prepared and made available to the public, response activities should continue. An ESD is not a new ROD and should not be coded as such in WasteLAN. It should be entered as a SubAction to the ROD (Action Name = Record of Decision and SubAction Name = Explanation of Significant Dif). ESD data are entered in WasteLAN at the time of ESD signature. Response action and cost data only need to be entered when they change. ESDs are tracked as an internal reporting measure.

iii. ROD Amendments are Fundamental Changes to the ROD

When the hazardous waste management approach selected in the ROD is reconsidered, it is a fundamental change. For example, the innovative technology originally selected in the ROD did not perform satisfactorily during the pilot scale testing, and a decision is made to switch to another remedy. This would represent a fundamental change. If, as a result of PRP negotiations, the remedy in the ROD is changed from incineration to bioremediation, this also represents a fundamental change. When such fundamental changes or amendments are made to a remedy, the ROD process (revised proposed plan, public comment period, public meeting, responsiveness summary, and amended ROD) should be repeated. The amended ROD must be placed in the AR and a copy must be mailed to the above HQ address. A fundamental change to the ROD should be recorded as a ROD amendment SubAction in WasteLAN (Action Name = Record of Decision and SubAction Name = ROD Amendment). Regions must enter the actual completion date of the ROD Amendment along with the Alternative Name, Media Name, Media Type, Selected Response Actions, and cost data. ROD Amendments are tracked as an internal reporting measure.

b. RODs Requiring No Physical Construction

At some NPL sites, EPA may determine, through the Remedial Investigation/Feasibility Study (RI/FS) (or other means), that no physical construction is necessary to protect human health and the environment. Such a determination may be documented in no action/no further action RODs, including RODs that only require monitoring, and Limited Action RODs requiring monitored natural attenuation or institutional controls only.

These ROD events should be coded into WasteLAN as follows:

- Action Name = Record of Decision;
- Alternative Name
- Media Name
- Media Type (Air, Ground water, Leachate, Liquid Waste, Other, Residuals, Sediment, Sludge, Soil, Solid Waste, Surface Waste); and
- Selected Response Actions
 - No Action RODs:
 - No Action
 - No Further Action
 - Monitoring

Cost data should be entered as 0 (zero)

- Limited Action RODs:
 - Natural Attenuation
 - Institutional Controls (Access Restriction, Access Restriction-Guards, Deed Restriction, Drilling Restriction, Fishing Restriction, Institutional Controls Not Otherwise Specified (N.O.S.), Land Use Restriction, Monitoring, Recreational Restriction, Revegetation, Swimming Restriction, and Water Supply Use Restriction)

II.N.7. Anomalies and Phased Projects

Anomalies are those projects that do not fit the normal definitions of pipeline actions. Anomalies can be those projects that 1) do not receive SCAP credit, but still need to be tracked, or 2) occur out of the ordinary pipeline progression.

An example of a SCAP anomaly occurs when different entities conduct FS work simultaneously that leads to a single ROD. Since it is inconsistent to give credit for more FS starts than completions (the Agency would have to explain why FS work is not leading to a ROD), only one FS can receive credit for a start and completion. These projects are coded under the same OU with multiple sequence numbers and those FSs that will not receive credit are given a Takeover/Phased Indicator of "Other Start and Completion Anomaly (OA)."

At the RD and RA stages, a project may be phased or time-sequenced to accelerate the cleanup effort. Phasing is complementary to OUs. Whereas OUs break large, complex projects into smaller, more manageable work elements, phasing is a method to accelerate the implementation of the OUs. Phasing manipulates the internal steps required to complete each OU, thereby optimizing the overall schedule; for example, a RA that requires site clearing prior to constructing an incinerator. The clearing would be one phase of the RA, while the construction of the incinerator would be a second phase.

Regions enter a separate RA for each phase. Phases of each response action are shown in WasteLAN by the use of the Takeover/Phased Indicators of Phased Start (PS) and Phased Complete (PC) or Phased Start and Completion (PB) (See Exhibit II.11). Funding required for each of the phases is tracked against the phase. However, the duration of the project is calculated from the date the first phase started to the date the last phase is completed.

**EXHIBIT II.11
REMEDIAL EVENTS, ANOMALIES, AND PROJECT PHASING**

OU	Action Name	Seq.	Lead	Plan Start	Plan Comp	Takeover/ Phased Indicator	Comment
01	PRP RI/FS	1	RP	96/2	98/3		
01	PRP FS	1	RP	97/3	98/3	OA	No Credit for Start or Completion
01	PRP FS	2	RP	97/3	98/3	OA	No Credit for Start or Completion
01	R01	1	FE		98/3		
	AN01						
01	RD1		RP	99/1	00/2	PC	PHASE I
01	RD2		RP	99/2	00/3	PB S	PHASE II
01	RA1		RP	00/3	01/1	PB C	PHASE I
01	RA2		RP	00/3	04/1	PS	PHASE II

II.O Subject Matter Experts

Exhibit II.12 identifies all SCAP report contacts. Exhibit II.13 identifies the subject matter experts for Chapter II Program Planning and Reporting Requirements.

**EXHIBIT II.12 SCAP REPORT CONTACTS
(REPORTS OWNER: R WHITE)**

Designation	Title	Report/Data Owner
SCAP-2/11/12	Site Summary Report/FOIA	Robert White, (703) 603-8873 Margaret Brown, (202) 260-8427 et al
SCAP-4E	Enforcement Financial Summary (Enforcement maintains this report)	Alice Ludington, (202) 564-6066
SCAP-4F	Federal Facility Financial Summary	Marie Bell, (202) 260-8427
SCAP-4R	Response Financial Summary Report	Willie Griffin, (703) 603-8911
SCAP-08	OPA Measures Report	Janet Weiner, (703) 603-8717 Dana Stalcup, (703) 603-8735
SCAP-13	Site Assessment/Brownfields Report	Randy Hippen, (703) 603-8829 Juanita Standifer, (202) 260-9192 Terry Jeng, (703) 603-8749 Jennifer Griesert, (703) 603-8888 James Maas, (202) 260-8927
SCAP-14	The Superfund Accomplishments Report	Robert White, (703) 603-8873 Dan Dickson, (202) 564-6041 Renee Wynn, (202) 260-8366 Marie Bell, (202) 260-8427 et al
SCAP-15	GPRA Report	Emily Johnson, (703) 603-8764
SCAP-16	Reconciliation SCAP 14 Audit Report	Robert White, (703) 603-8873 et al
SCAP-21	Contract Bulk Funding Report	Jennifer Hemsley, (703) 603-8921

EXHIBIT II.13 SUBJECT MATTER EXPERTS

Subject Matter Experts	Subject Area	Phone #
Sharon Blandford Art Flaks	Chapter 2 Lead	(703) 608-8752 (703) 603 9088
Dela Ng	Enforcement	(202) 564-6073
Emily Johnson	GPRA	(703) 603-8764
Mark Mjones	Emergency Response/Removal	(703) 603-8727
Matthew Charsky	RODs/Remedy Selection	(703) 603-8777
Hans Waetjen	RODs/Remedy Selection	(703) 603-8906
Robert White	SCAP Reports Owner	(703) 603-8873
Melanie Hoff	Program Planning/EI	(703) 603-8808
Erin Conley	Management Reports	(703) 603-8928
Alan Youkeles	PARM	(703) 603-9026

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